

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

VS.

Crim. No. 04-30046-MAP

ALBERT INNARELLI, ET AL,
DEFENDANTS

**MOTION OF DEFENDANT MICHAEL BERGDOLL
TO MODIFY CONDITIONS OF RELEASE**

Now comes the defendant Michael Bergdoll and moves that the conditions of his pre-trial release restricting his travel to the Commonwealth of Massachusetts and the State of Connecticut be modified.

The defendant seeks permission to travel to Negril, Jamaica with his wife Judith Bergdoll and their two sons, Michael J. Bergdoll and Joseph Bergdoll. This trip will occur during the April, 2005 school vacation from April 15, 2005 to April 21, 2005. Attached hereto is a copy of the defendant's travel itinerary. Mr. Bergdoll and his family will be staying at the Beaches Negril Beach Resort & Spa, Long Bay Negril, Jamaica, West Indies and the telephone number for the hotel is 876-957-9270

Counsel for the defendant has conferred with counsel for the government and the government does not oppose the allowance of this motion.

Wherefore the defendant respectfully requests that the within motion be allowed.

The Defendant
Michael Bergdoll
By his attorney

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CERTIFICATE OF SERVICE

I, Steven W. Leary, Esquire, counsel of record, hereby certify that I made service of the foregoing document by mailing a copy of same, postage prepaid, to all attorneys of record.

April 8, 2005

Steven W. Leary, Esq
Steven W. Leary